

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

MEGAN MCGUIRE)
Plaintiff,) CASE NO. 8:16 CV 00004
vs.)
CORY COOPER, et al.) **DEFENDANTS TIMOTHY F.**
Defendants.) **DUNNING'S AND DOUGLAS**
) **COUNTY'S MOTION TO**
) **RESTRICT ACCESS**
)

In support of the Defendants' Motion for Summary Judgment, they wish to provide this Court with several documents that could be deemed confidential in nature, including records of internal investigations into persons not parties to this lawsuit. Nebraska public records laws permit these records to be shielded from public disclosure under Neb. Rev. Stat. § 84-712.05 (7). During discovery, Defendants produced these documents under the auspices of the Agreed Confidentiality Order entered August 26, 2016 (Document 46) and marked them with a stamp of "Confidential". Defendants also wish to provide this Court with testimonial documents in which the topics set forth within these documents are discussed. Finally, Defendants wish to provide this Court with documents and deposition transcripts containing information about Ms. McGuire that is potentially subject to the Qualified HIPAA Protective Order entered August 26, 2016 (Document 45)

For these reasons, and pursuant to NEGenR 1.3(a)(1)(B) and NECivR 5.3(c), Defendants ask they be allowed to file the following as restricted: (1) Defendants' Joint Index of Evidence In Support of Their Motion for Summary Judgment and attached 28 exhibits; and (2) Defendants' Briefs in support of their Motion for Summary Judgment.

WHEREFORE, Defendants respectfully request this Court grant this motion.

Dated this 2nd day of April, 2018.

TIMOTHY F. DUNNING, Individually and in his official capacity as Sheriff of Douglas County, Nebraska, and COUNTY OF DOUGLAS, NEBRASKA, Defendants.

DONALD W. KLEINE,
Douglas County Attorney.

BY: /s/ Timothy K. Dolan
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CERTIFICATE OF SERVICE

I hereby certify that on April 2nd, 2018, I electronically filed the foregoing Defendants Timothy F. Dunning's and Douglas County's Joint Motion to Restrict Access with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Arthur Loevy
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I hereby further certify that on April 2nd, 2018, I mailed the foregoing Defendants Timothy F. Dunning's and Douglas County's Joint Motion to Restrict Access by First Class United States Mail, postage prepaid, to the following:

Mr. Cory Cooper
10212 V Street
Omaha, Nebraska 68127

/s/ Timothy K. Dolan